

IN THE DISTRICT COURT OF OKLAHOMA COUNTY

STATE OF OKLAHOMA

JOHNNY ROE, SHELBY ROE, and JACOB ROE,)		30 d
Plaintiffs,)		
VS.)) 	se No	
AUTUMN BROWN,)	CJ	2015 - 5897
Defendant.)		

<u>PETITION</u>

Plaintiffs state:

- On November 3, 2013 at approximately 8:00 p.m., Plaintiffs Shelby Roe 1. ("Shelby") and Jacob Roe ("Jacob") were passengers in a vehicle being driven by Plaintiff Jonny Roe ("Johnny"). Johnny was driving northbound on N. May Ave. near NW 50th St.
- Defendant Autumn Joy Brown ("Defendant") was driving southbound on N. May 2. Ave. when she attempted to turn left into a parking lot on the east side of N. May Ave., collided with the left front end of Johnny's vehicle, and pushed Johnny's vehicle off the road.
 - 3, The collision resulted from Defendant's negligence as follows:
 - Defendant was traveling at a speed in excess of the posted speed limit and/or at a speed wherein she could not stop within the assured clear distance ahead.
 - Defendant failed to keep a proper lookout.
 - Defendant failed to devote her full time and attention to her driving.
 - Defendant made an improper left hand turn.
 - Defendant failed to yield the right of way.

- f. Defendant failed to use her brakes, horn or steering mechanism to avoid the collision.
- g. Defendant failed to maintain proper control over her vehicle at a time when Defendant knew or should have known that without such control persons, including Johnny, Shelby and Jacob, were likely to be injured.
- 4. As a result of Defendant's negligence, Plaintiffs suffered personal injuries that are permanent, painful and progressive.
- 5. At the time of the subject collision, Johnny was 52 years old with a life expectancy of 27.84 years. Johnny has and will incur medical expense, has and will suffer pain of mind and body, and has been damaged in an amount in excess of \$75,000.00.
- 6. At the time of the subject collision, Shelby was 36 years old with a life expectancy of 46.15 years. Shelby has and will incur medical expense, has and will suffer pain of mind and body, and has been damaged in an amount in excess of \$75,000.00.
- 7. At the time of the subject collision, Jacob was 24 years old with a life expectancy of 53.35 years. Jacob has and will incur medical expense, has and will suffer pain of mind and body, and has been damaged in an amount in excess of \$75,000.00.

WHEREFORE, Plaintiffs pray judgment against Defendants in an amount in excess of \$75,000.00, together with attorney fees, interests and costs of this action.

Respectfully submitted,

DACIA ABEL, OBA #30968

ABEL LAW FIRM 900 N.E. 63rd Street Oklahoma City, OK 73105 (405) 239-7046 (405) 418-0833 (fax) dabel@abellawfirm.com ATTORNEY FOR PLAINTIFFS

ATTORNEYS' LIEN CLAIMED